

### **REMARKS/ARGUMENTS**

Applicants thank the Examiner for his careful review of this application. Claims 1-19 have been rejected. Applicants respectfully request reconsideration of the application in view of the following remarks submitted in support thereof.

#### **Obviousness Rejections under 35 U.S.C. §103(a)**

Claims 1-19 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Java Media Framework API Guide* (November 19, 1999) <<http://java.sun.com/products/java-media/jmf/2.1.1/guide/JMFTOC.html>> (herein further referenced as Java Guide) in view of Mathur et al. (U.S. 2005/0066340 A1). As will be fully explained below, the combination of Java Guide in view of Mathur et al. does not raise a *prima facie* case of obviousness against independent Claims 1, 9, and 17.

Independent Claims 1, 9, and 17 define mobile multimedia framework application program interfaces (API) capable of operation in mobile hardware devices. Among other features, a memory size of the mobile multimedia framework API is less than 100 kilobytes. Furthermore, independent Claim 1 defines a mobile multimedia framework API that consists of a playback interface, a control interface, an event listener interface, an error list interface, an exceptions interface, an events interface, and a protocol handler interface. Independent Claims 9 and 17 define a playback interface consisting of a manager API, a package manager API, a player API, a time API, a time base API, a system time base API, and a media locator API.

In support of the obviousness rejection, the Examiner notes that Java Guide discloses a mobile multimedia framework API that consists of a playback interface, a control interface, an event listener interface, and an events interface, as defined in independent Claim 1, and a

playback interface consisting of a manager API, a package manager API, a player API, a time API, a time base API, a system time base API, a media locator API, and an event listener, as defined in independent Claims 9 and 17. Applicants respectfully traverse the Examiner's characterizations in this regard because, as discussed previously in the Applicants' Amendments mailed July 20, 2005 and October 29, 2004, the Examiner simply cites to elements disclosed in separate portions of the Java Guide. However, the Java Guide does not disclose anywhere that the cited elements are grouped together as defined in independent Claims 1, 9, and 17, where independent Claim 1 defines a mobile multimedia framework API that *consists* of a playback interface, a control interface, an event listener interface, an error list interface, an exceptions interface, an events interface, and a protocol handler interface, and independent Claims 9 and 17 define a playback interface that *consists* of a manager API, a package manager API, a player API, a time API, a time base API, a system time base API, and a media locator API.

Moreover, the Examiner acknowledges that Java Guide does not teach an error list interface, an exception interface, and a protocol handler interface, as recited in independent Claim 1, and a protocol handler interface as recited in independent Claims 9 and 17. The Examiner then concludes that it would have been obvious that these interfaces "existed in the framework" disclosed by Java Guide because Java Guide discloses protocols, error types, and exception types. Applicants respectfully request that the Examiner explain the basis of how the Examiner can conclude that a mere disclosure of protocols, error types and exception types, without any further evidence, makes it obvious that a protocol handler interface, an error list interface, and an exception interface "existed in the framework" provided by Java Guide.

To establish a prima facie case of obviousness based on a combination of references, there additionally must be some suggestion or motivation, either in the references or in the knowledge generally available to one having ordinary skill in the art, to combine the references in the manner proposed. As will be explained below, the Examiner has not established a prima facie case of obviousness against the claimed subject matter because one having ordinary skill in the art would not have combined Java Guide and Mathur et al. in the manner proposed by the Examiner.

In support of the obviousness rejection, the Examiner notes that although neither Java Guide nor Mathur et al. teaches the memory size of the mobile multimedia framework API being less than 100 kilobytes, Mathur et al. “teaches a modified operating system ... with limited constrain memory” and therefore, “providing small API for the operating system is well known and applied in the art” (*see* Office Action mailed September 26, 2005 at page 3). Applicants respectfully traverse the Examiner’s characterization in this regard because the cited portions of Mathur et al. relied upon by the Examiner (page 4, paragraphs 62-63; page 2, paragraphs 15-18; page 6, paragraphs 102-103) do not teach or suggest that having a mobile multimedia framework API that is less than 100 kilobytes is common knowledge or well-known in the art, as recited in independent Claims 1, 9, and 17, and these cited portions do not provide the suggestion or motivation to combine the references in the manner proposed.

In particular, Mathur et al. discloses an operating system environment that includes a kernel, with memory management capabilities designed specifically for small, fast, embedded devices, which requires “a single 4 GB address space.” *See* page 4, paragraphs 62-63. Mathur et al. further discloses that the 4 GB address space is “divided into 33 ‘slots,’ each of which has a size of 32 MB.” *See* pages 4-5, paragraph 63. Applicants note that the total

memory requirement for supporting the system disclosed in Mathur et al. is *at least four orders of magnitude greater* than the 100 kilobyte memory of the claims in the present application and *even* the individual 32 MB memory slots of the 4 GB memory disclosed in Mathur et al. exceed the memory requirements of the claims of the present application by *at least one order of magnitude*. Thus, Applicants respectfully request that the Examiner explain the basis for concluding that, given the specific teachings of Mathur et al. discussed above, a memory size of a mobile multimedia framework API which is less than 100 kilobytes is “well known and applied in the art” or would have been obvious to one of ordinary skill in the art based on the teachings of Java Guide and Mathur et al.

Logically, therefore, it would be counter intuitive to one of ordinary skill in the art to apply the principals taught in Java Guide and Mathur et al. to the claims of the present application. First, as previously mentioned, the teachings of Java Guide or Mathur et al. do not teach or suggest a memory size that is less than 100 kilobytes. Second, as also previously mentioned, Mathur et al. expressly teaches a 4 gigabyte memory requirement that is *at least four orders of magnitude greater than that of the claims of the present application*. One of ordinary skill in the art would be discouraged by the teachings of Mathur et al. because one of the objects of the present application it to *reduce* the memory size of a mobile multimedia framework API (*see* Present Application, page 6, lines 3-10; page 14, lines 15-20) and Mathur et al. discloses a memory requirement that is at least several orders of magnitude greater than that of the claims of the present application. Thus, there is no suggestion or motivation to make the proposed combination, and the teachings of Java Guide and Mathur et al. are not sufficient to render independent Claims 1, 9, and 17 *prima facie* obvious.

Furthermore, in support of the obviousness rejection, the Examiner also notes that Friedrich et al., *A Survey of Configurable, Component-Based Operating Systems for*

*Embedded Applications*, IEEE May-June 2001 teach operating systems in a range from 20-26 kbytes. The Applicants respectfully traverse the Examiner's assertion because independent Claims 1, 9, and 17 define *application program interfaces* and not operating systems. Furthermore, Friedrich et al. discloses "[i]t is *not clear* to what extent MMLite provides users with the ability to easily select components that the MMLite developers write, and to what extent users themselves define and utilize their own new components" (page 63). Since Friedrich et al. specifically admit that the selection of components is unclear, there is no motivation or suggestion to group the interfaces as defined in independent Claims 1, 9, and 17.

Accordingly, for the above-stated reasons, Applicants submit that independent Claims 1, 9, and 17 are patentable under 35 U.S.C. §103(a) over Java Guide in view of Mathur et al. Claims 2-8, 10-16, and 18-19, each of which depends directly or indirectly from one of independent Claims 1, 9, or 17, are likewise patentable under 35 U.S.C §103(a) over Java Guide in view of Mathur et al. for at least the same reasons set forth for independent Claims 1, 9, and 17. As a result, Applicants respectfully request the Examiner to withdraw the 35 U.S.C. §103(a) rejections for Claims 1-19.

### **Conclusion**

In view of the foregoing, the Applicants respectfully submit that all the pending Claims 1-19 are in condition for allowance. Accordingly, a Notice of Allowance is respectfully requested. If the Examiner has any questions concerning the present request, the Examiner is requested to contact the undersigned at (408) 774-6920. If any additional fees are due in connection with filing this request, the Commissioner is also authorized to charge

Deposit Account No. 50-0805 (Order No. SUNMP011). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,  
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